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**REMOVAL ACTION NUMBER 9: RESPONSE TO
OHIO EPA COMMENTS**

12-06-1991

**DOE-FO/EPA
DOE-436-1992
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LETTER**



Department of Energy
Fernald Environmental Management Project
P.O. Box 398705
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DOE-436-92

Mr. James A. Saric, Remedial Project Director
U. S. Environmental Protection Agency
Region V - 5HR-12
230 South Dearborn Street
Chicago, Illinois 60604

Mr. Graham E. Mitchell, DOE Coordinator
Ohio Environmental Protection Agency
40 South Main Street
Dayton, Ohio 45402-2086

Dear Mr. Saric and Mr. Mitchell:

REMOVAL ACTION NUMBER 9: RESPONSE TO OHIO EPA COMMENTS

- References:
1. Letter, DOE-2089-91, J. R. Craig to J. A. Saric and G. E. Mitchell, "Removal Action No. 9 - Removal of Waste Inventories," dated August 28, 1991
 2. Letter, DOE-2122-91, J. R. Craig to J. A. Saric and G. E. Mitchell, "Thorium Low Level Waste Management Activities Outline," dated August 28, 1991
 3. Letter, DOE-2295-91, J. R. Craig to J. A. Saric and G. E. Mitchell, "Removal Action No. 9 - Removal of Waste Inventories/Thorium Management Procedures," dated September 26, 1991

The purpose of this letter is to transmit the revised sections of the referenced submittals incorporating the comments received from the Ohio Environmental Protection Agency (Ohio EPA) on the procedures and steps necessary for the overpacking and management of thorium low level waste at the Fernald Environmental Management Project (FEMP).

Enclosure I: FEMP responses to Ohio EPA comments on References 1, 2, and 3 above.

Enclosure II: Revised Thorium Management Procedures for Containers To Be Overpacked, Removal Action Number 9. Originally titled, "Thorium Low Level Waste Management Activities Outline." This is a revision to Reference 2 above.

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Enclosure III: Revised Documentation Supporting FEMP Removal of Waste Inventories, Thorium Management Procedures "To Be Overpacked," Removal Action Number 9. This is a revision to Section A, Program Overview, of Reference 3 above.

Enclosure IV: DOE Order 5820.2A and SOP 1-C-604, Inspection of Containerized Refuse Material and Drummed Residues. Please note that DOE Order 5820.2A was requested by the Ohio EPA for both References 1 and 3.

Also, per a request by U.S. EPA in order to facilitate their review, an additional copy of the original "Removal Action Number 9 - Thorium Procedures" has been furnished to the U.S. EPA. Please note that this document does not include the revisions per the Ohio EPA comments. Consistent with the Consent Agreement negotiations, the FEMP will continue low level waste management activities at the site using the existing procedures while the U.S. EPA is reviewing this submittal. The activities will include the continuation of low level waste shipments and repackaging/overpacking operations.

If you or your staff has any questions, please contact me at FTS 774-6159 or Robert J. Janke at FTS 774-6883.

Sincerely,



Jack R. Craig
Fernald Remedial Action
Project Manager

FO:Janke

Enclosures: As Stated

cc w/encls.:

J. J. Fiore, EM-42, TREV
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